

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ADWOWA JACOBS,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION AND JEFF
WILLIAMS,

Defendants.

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CIVIL ACTION NO.

2:05-CV-925-MHT-SRW

DECLARATION OF CHRISTINE CORNWELL


1. My name is Christine Cornwell. I am currently over twenty-one (21) years of age and I have never been convicted of a felony or crime of moral turpitude. I have been employed by Electronic Data Systems Corporation ("EDS") since November 1984. Since January 2004, I have held the position of Human Resource Business Partner supporting EDS' US Government organization. In this role, I was the Human Resource Business Partner responsible for supporting the Montgomery, Alabama facility from approximately January 2004 to April 2005. Specifically, I was responsible for providing guidance to management relating to human resource services and issues. As such, I have personal knowledge of the facts stated herein and they are true and correct.

2. On February 10, 2005, Tara Relf contacted me and advised me that one of her direct reports, Adwowa Jacobs, had reported to her that a co-worker, Jeff Williams, had hugged her and rubbed against her on the elevator returning from lunch. Due to the serious allegations made by Ms. Jacobs, I determined that it was necessary to involve EDS' Employee Relations department. Therefore, I contacted Employee Relations Specialist, Leslie Liebman, and asked that she investigate and respond to Ms. Jacobs' report.



I declare under the penalty of perjury of the laws of the United States of America (28 U.S.C. § 1746) that the foregoing is true and correct.

EXECUTED this 25th day of October, 2006.


Christine Cornwell

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